

SEP 28 1999

1384



SIERRA NEVADA ALLIANCE

PO Box 7989
S. Lake Tahoe
California 96158

Tel: 530.542.4546
Fax: 530.542.4570

sna@sierranevadaalliance.org

September 23, 1999

President
Stan Weidert
Biologist

Vice President
Bill Center
Camp Lotus

Secretary
Scott Kruse
Biophysical Geographer

Treasurer
Patty Brissenden
Sorensen's Resort

Executive Director
Laurel W. Ames

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth St. #1155
Sacramento, Ca 95814

Dear Mr. Breitenbach,

The Alliance is pleased to submit comments on the CALFED Bay-Delta Program EIS/EIR. The Alliance has participated in the BDAC Watershed Work Group and sits on the Ecosystem Roundtable. We are very concerned with the health of the upper watersheds and their benefit to and potential for adverse impacts on the waters of the Bay and the Delta.

Board of Directors:

Jim Baetge
*Tahoe Regional Planning
Agency*

Randy Barrow
Attorney

Joan Boothe
Organizational Consultant

Martha Davis
Californians and the Land

Shawn Garvey
*South Yuba River Citizens
League*

Bob Kelso
Business Owner

Lynn Sadler
Mountain Lion Foundation

John Thorne
Thorne's Tree Service

Watersheds produce clean water in direct proportion to the health of the watershed. The Sierra Nevada Alliance is committed to assuring that Sierra watersheds are restored and protected in order to achieve ecosystem health and to produce clean water for riparian and aquatic health, drinking water, and, with the support of the users of Sierra water, the Bay-Delta ecosystem.

Unfortunately, the CALFED Bay-Delta Program EIS/EIR fails to address the benefits and impacts of the upper watersheds, fails to link the watersheds to water quality, reliability, and flooding and efficiency, and fails to assess the impacts and benefits that are implicit in those linkages.

Our comments are attached. Thank you for the opportunity to comment.

Very truly yours,

Laurel W. Ames
Executive Director



September 23, 1999

SIERRA NEVADA ALLIANCE COMMENTS
CALFED BAY-DELTA PROGRAM EIS/EIR

1. CalFeds' watershed program acknowledges that watersheds exist, but in any effort to integrate the watershed program with the other common elements, the connection collapses if there are no anadromous fish that will be affected. This apparent defining status of watersheds that matter and watersheds that don't precludes the program from taking a serious look at the environmental benefits that can be achieved from watershed restoration of **all** watersheds that are tributary to the Bay-Delta, whether previously or currently supporting anadromous fish and other aquatic species.

A fundamental principle of watershed restoration is that the restoration processes must start at the top and work down. The tributaries to the Bay and the Delta hold the key to restoring the Bay-Delta ecosystems - - without clean water from the tributaries the efforts to restore the Bay-Delta that assume clean water but do nothing to attain clean water will be doubly difficult.

Comment: the EIS/R fails to connect the dots between the health of the upper watersheds and the benefits to the efforts to restore the Bay-Delta ecosystem. The lack of such an analysis precludes understanding the impacts of not restoring upper watershed health. The EIS/R fails to include an alternative that adequately explains the interrelatedness of upper watershed health to the CalFed goal of developing a long-term comprehensive plan that restores the ecosystem health and improves water management for beneficial uses of the Bay-Delta ecosystem

2. The Sierra Nevada Alliance has been working to help new watershed groups develop. We are appalled that the plan proposes that watershed restoration is to become self-sufficient for program management and administration.

Comment: There is no analysis of the environmental impact of one element, and one element only, becoming financially self-sufficient. Does the EIS/R assume that this requirement would provide the same level of environmental benefits as a fully funded program? If the assumption is that a self-sufficient program would be environmentally more effective in providing environmental benefits, then why wasn't it applied to other elements of the program? Please address the assumptions, intent and environmental impact of this unusual implementation recommendation that separates funding for watershed restoration from other common elements.

3. Watershed groups find that they must include other common elements such as water quality, species habitat, flood management, water use efficiency and economic benefits as they assess and design watershed restoration projects. These linkages are

obvious to watershed groups and these issues are included in the process of development of watershed restoration plans.

Comment: The collection of documents that make up the program fail to develop the environmental linkages between the watershed restoration program and the other common programs. This leads to a significant deficiency in the EIS/R and raises the question: "How can a program with discrete program elements analyze the environmental impact of the program if the pieces are analyzed separately and no linkages established between them?" Where is the cumulative impact of the implementation of all the program elements? How can a programmatic analysis be assumed in the EIS/R when there is no description or understanding of how the parts relate to each other?

4. It is important not to confuse **water** management with **watershed** management. But the two are inextricably linked because of the watershed restoration benefits to water management. This linkage is never explained in the documents and the benefits of **watershed** restoration and management are not calculated in the environmental impacts analysis. It would be unconscionable for CalFed to promote expensive public works projects without understanding the extent of the benefits to the state's water budget from **watershed** restoration.

Comment: Prior to implementation of additional large-scale **water** management projects that relies on constructing additional and massive public works projects, the low-cost benefits of **watershed** restoration must be assessed and disclosed in the EIS/R.

5. The program is intended to have a life of 30 years, yet without adequate baseline it is difficult to understand how informed choices about the best mix of watershed management activities and new water management infrastructure can be made.

Comment: CalFed must limit the ROD to the length of time in Stage 1 so that an adequate baseline of data can be developed, the linkages between the common programs can be established and analyzed, and a coherent water future for California can be established. Completing those Stage 1 actions which are relatively well defined and well accepted would qualify as doing the least harm.

6. The proposed Watershed Management Program actions and budgets are woefully inadequate to launch the watershed restoration program that is needed to protect and restore the Bay-Delta. We assume that the lack of adequate funding is due to the lack of understanding of the linkages between the program elements, and especially the watershed management program to water quality, reliability, and efficiency. Since the linkages are so poorly understood, the analysis that led to a paltry level of funding would likely follow.

Comment: Watershed groups have a clearer understanding of the costs and benefits of watershed funding. We estimate that \$270 million per year will begin the